

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA
and the STATE OF WISCONSIN,

Plaintiffs,

v.

NCR CORPORATION and
SONOCO-U.S. MILLS, INC.
(formerly known as U.S. Paper Mills
Corp.),

Defendants.

CIVIL ACTION NO. 06-CV-00484

The Honorable Lynn Adelman

UNITED STATES' UNOPPOSED MOTION TO ENTER CONSENT DECREE

The United States of America (the "United States"), by and through its undersigned attorneys, hereby moves that the Court enter the accompanying proposed "Order Entering Consent Decree." The pending proposed Consent Decree in this case is the latest in a series of partial settlements relating to polychlorinated biphenyl ("PCB") contamination in the Lower Fox River and Green Bay Site. The Decree would require the Defendants to dredge and dispose of the most highly-contaminated sediments in the River on an expedited basis, at an estimated cost of \$30 million. The United States, the State of Wisconsin, and the Settling Defendants all support entry of the Decree.

The reasons for entry of the Consent Decree are set forth more fully in the accompanying "Brief in Support of United States' Motion to Enter Consent Decree."

Respectfully submitted,

For the United States of America

SUE ELLEN WOOLDRIDGE
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice

Dated: August 16, 2006

s/ *Randall M. Stone*
RANDALL M. STONE, Senior Attorney
JEFFREY A. SPECTOR, Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044-7611
Telephone: (202) 514-1308
Facsimile: (202) 616-6584
E-Mail: randall.stone@usdoj.gov

STEVEN M. BISKUPIC
United States Attorney

MATTHEW V. RICHMOND
Assistant United States Attorney
Eastern District of Wisconsin
U.S. Courthouse and Federal Building - Room 530
517 E. Wisconsin Avenue
Milwaukee, WI 53202

CERTIFICATE OF SERVICE

Pursuant to Paragraphs 94 and 106 of the pending proposed Consent Decree, I hereby certify that copies of the foregoing Unopposed Motion to Enter Consent Decree were served on this date by the Court's Electronic Case Filing system and by first-class mail, postage prepaid, upon the following individuals:

General Counsel
NCR Corporation
Law Department
1700 South Patterson Blvd.
Dayton, OH 45479

J. Andrew Schlickman
Sidley Austin LLP
1 South Dearborn Street
Chicago, IL 60603

Thomas R. Gottshall
Haynsworth Sinkler Boyd, P.A.
1201 Main Street, 22nd Floor
Columbia, SC 29201-3226

John M. Van Lieshout
Reinhart Boerner Van Deuren S.C.
1000 North Water Street, P.O. Box 2965
Milwaukee, WI 53201-2965

Wisconsin Department of Justice
Division of Legal Services
Environmental Protection Unit
P.O. Box 7857
Madison, WI 53707-7857

Dated: August 16, 2006

s/ Randall M. Stone